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11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**  
13 **(HONORABLE THOMAS J. WHELAN)**

14 <b>UNITED STATES OF AMERICA,</b>	) Case No.: 08-CR—00676-001-TJW
15	)
16 Plaintiff,	) <b>DEFENDANT'S MOTION TO</b>
17	) <b>CONTINUE SENTENCING FOR</b>
18 vs.	) <b>30 DAYS</b>
19	)
20 <b>ANGEL VAZQUEZ-TOLEDO,</b>	)
	)
21 Defendant	)

22 Defendant Angel Vazquez-Toledo, by and through his counsel  
23 undersigned, moves the Court to issue its order continuing the sentencing in the  
24 above-captioned matter for a period of 30 days or as soon thereafter as is  
25 convenient for the Court and parties.

26 This motion is made on the grounds that the Defendant was unable  
27 to establish his qualification for “safety valve” treatment until June 18, 2008,  
28 when he was made available for interview by the United States Attorney’s Office.

**DEFENDANT’S MOTION TO CONTINUE  
SENTENCING FOR 30 DAYS; Page 1**

1 AUSA George Manahan, the Assistant United States Attorney handling this  
2 matter, has stated to undersigned counsel that he will notify the Court and  
3 Probation Office that Mr. Vazquez-Toledo has fulfilled the requirements to  
4 qualify him for "safety valve" treatment.

5 Undersigned counsel, however, requires additional time to prepare  
6 and submit a Sentencing Memorandum prior to sentencing which includes the  
7 "safety valve" consideration.

8 Undersigned counsel is authorized to state that AUSA George  
9 Manahan takes no position with regard to this motion or any order based  
10 thereon.

11 For all the forgoing reasons, the sentencing in this matter should be  
12 continued from June 23, 2008 for a period of 30 days or as soon thereafter as is  
13 convenient for the Court and parties.

14 Submitted this 19<sup>th</sup> day of June, 2008.

15 **FRANCISCO LEÓN, P.C.**

16 */s/Francisco León*  
17 **Francisco Leon**  
18 [azcrimlaw@gmail.com](mailto:azcrimlaw@gmail.com)

19 Copies of the forgoing mailed/electronically delivered this  
19<sup>th</sup> day of June, 2008 to the following:

20 George Manahan  
Assistant United States Attorney

21 Carolyn M. Casutt  
22 Probation Officer

23 Andrew Nietor  
Local Counsel for Defendant

24 Angel Vazquez-Toledo